

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SOVEREIGN PEAK VENTURES, LLC,

Plaintiff,

V.

**TCL TECHNOLOGY GROUP
CORPORATION,**

**TCL INDUSTRIES HOLDINGS CO.,
LTD.,**

TCL ELECTRONICS HOLDINGS LTD.,

TCL COMMUNICATION

TECHNOLOGY HOLDINGS LTD.,

HUIZHOU TCL MOBILE

COMMUNICATION CO. LTD.,

TCT MOBILE WORLDWIDE LTD.,

TCT MOBILE INTERNATIONAL LTD.,

**SHENZHEN TCL NEW TECHNOLOGIES
CO. LTD.,**

**TCL KING ELECTRICAL APPLIANCES
(HUIZHOU) CO. LTD.,**

TCL MOKA INTERNATIONAL LTD.,

and

**TCL MOKA MANUFACTURING S.A.
DE C.V.**

Defendants.

**JOINT AGREED MOTION TO EXTEND THE TIME FOR PLAINTIFF
TO SERVE PRELIMINARY INFRINGEMENT CONTENTIONS AND
FOR DEFENDANTS TO SERVE PRELIMINARY INVALIDITY
CONTENTIONS**

Plaintiff Sovereign Peak Ventures, LLC (“SPV”) and Defendants TCL Technology Group Corporation, TCL Industries Holdings Co., LTD., TCL Electronics Holdings LTD., TCL Communication Technology Holdings LTD., Huizhou TCL Mobile Communication Co. Ltd., TCL Mobile Worldwide LTD., TCT Mobile International LTD., Shenzhen TCL New Technologies

Corporation, TCL Industries Holdings Co., LTD., TCL Electronics Holdings LTD., TCL Communication Technology Holdings LTD., Huizhou TCL Mobile Communication Co. Ltd., TCT Mobile Worldwide LTD., TCT Mobile International LTD., Shenzhen TCL New Technologies

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TCT Mobile Worldwide LTD., TCT Mobile International LTD., Shenzhen TCL New Technologies

Co. Ltd., TCL King Electrical Appliances (Huizhou) Co. Ltd., TCL Moka International Ltd., and TCL Moka Manufacturing S.A. DE C.V. (collectively, “Defendants”) jointly move the Court to extend the time within which Plaintiff is required to serve Preliminary Infringement Contentions for seven (7) days in each of the above-referenced actions, which would be up to and including May 5, 2021. In addition, Defendants’ deadline for serving invalidity contentions would also be extended for seven (7) days in each of the above-referenced actions, which would be up to and including June 30, 2021. No other deadline set by the Court in the forthcoming Docket Control Order and Discovery Order shall be extended at this time, and the parties shall be prepared to attend the Court’s Case Management Conference.

Accordingly, the parties request that the Court grant the request for a one week extension of both the preliminary infringement contentions, and the preliminary invalidity contentions. The parties do not make this motion for purposes of delay, but for good cause.

Dated: April 28, 2021

Respectfully submitted,

Respectfully submitted,
/s/ Patrick J. Conroy, with permission

Patrick J. Conroy
Texas Bar No. 24012448
T. William Kennedy Jr.
Texas Bar No. 24055771
Jonathan H. Rastegar
Texas Bar No. 24064043
Jerry D. Tice, II
Texas Bar No. 24093263

Bragalone Conroy PC

2200 Ross Avenue
Suite 4500W
Dallas, TX 75201
Tel: (214) 785-6670
Fax: (214) 785-6680
pconroy@bcpc-law.com
bkennedy@bcpc-law.com
jrastegar@bcpc-law.com
jtice@bcpc-law.com

Attorneys for Plaintiff
Sovereign Peak Ventures, LLC

/s/ Mr. Robert Gaybrick

Robert Gaybrick
Bradford Cangro
PV LAW GROUP LLP
5335 Wisconsin Avenue, N.W.
Suite 440
Washington, D.C. 20015-2052
(202) 773-4112
robert.gaybrick@pvuslaw.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel on April 28, 2021.

/s/ Jacob A. Snodgrass

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff and counsel for Defendants conferred regarding the relief sought by this motion and that this motion is unopposed.

/s/ Jacob A. Snodgrass